

BEFORE THE  
**Federal Communications Commission**  
 WASHINGTON, DC 20554

In the Matter of )

Telephone Number Portability )

) CC Docket No. 95-116

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: Chief, Wireless Telecommunications Bureau

**COMMENTS OF PRIMECO PERSONAL COMMUNICATIONS, L.P.**

PrimeCo Personal Communications, L.P. ("PrimeCo"),<sup>1</sup> hereby files the following brief comments in response to the Wireless Telecommunications Bureau's ("Bureau") Public Notice seeking comment on the Petition for Waiver filed by the Cellular Telecommunications Industry Association ("CTIA Waiver Petition") requesting extension of the implementation deadlines for wireless number portability ("WNP").<sup>2</sup> For the reasons discussed herein, PrimeCo urges the Commission to grant the CTIA Waiver Petition and extend the compliance deadline by nine months to March 31, 2000.<sup>3</sup>

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<sup>1</sup> PrimeCo is the broadband A/B Block PCS licensee or is the general partner/majority owner in the licensee in the following MTAs: Chicago, Milwaukee, Richmond-Norfolk, Dallas-Fort Worth, San Antonio, Houston, New Orleans-Baton Rouge, Jacksonville, Tampa-St. Petersburg-Orlando, Miami and Honolulu.

<sup>2</sup> *Public Notice, Wireless Telecommunications Bureau Seeks Comment on CTIA Petition for Waiver to Extend the Implementation Deadlines of Wireless Number Portability*, CC Docket No. 95-116, DA 97-2579 (released December 9, 1997) ("Public Notice").

<sup>3</sup> A nine-month extension is consistent with the Commission's rules and *Number Portability First Report and Order*. 11 FCC Rcd. 8352, 8440 ¶ 167 (1996). For the reasons discussed herein, however, additional time beyond the 9 month extension requested by CTIA will clearly be necessary for carrier implementation

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## DISCUSSION

Section 52.31 of the Commission's rules requires all cellular, broadband PCS, and covered SMR providers to "provide a long-term database method for number portability, including the ability to support roaming" consistent with the Commission's Part 52 performance criteria by June 30, 1999. The Bureau has been delegated the authority to extend that deadline by an additional nine months.<sup>4</sup> PrimeCo supports CTIA's conclusion that broadband CMRS providers will be unable to comply with the June 30, 1999 deadline and that an extension is required.<sup>5</sup>

PrimeCo agrees with CTIA's status report on the standards process and the critical need for standards availability prior to WNP implementation.<sup>6</sup> PrimeCo also agrees with CTIA's discussion of the technical issues relating to WNP implementation.<sup>7</sup> The standards process is ongoing, and only when complete (reportedly later this year) can switching equipment and software vendors begin to design and produce the modifications

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<sup>3</sup> (...continued)  
of WNP. Otherwise, network reliability will be compromised.

<sup>4</sup> 47 C.F.R. §§ 52.31(a), (c).

<sup>5</sup> PrimeCo notes that CTIA has also filed a Petition for Forbearance requesting that the Commission forbear from imposing number portability requirements on CMRS providers. Petition for Forbearance of the Cellular Telecommunications Industry Association, Telephone Number Portability, CC Docket No. 95-116, filed December 16, 1997. PrimeCo submits that the forbearance petition should be placed on public notice expeditiously.

<sup>6</sup> Many issues of major importance to PrimeCo, including necessary modifications for Global Title Translation (GTT) implementation, IS-41 signaling, home location register (HLR), mobile switching centers (MSCs) and call origination, are still under development by standards bodies. Resolution by standards bodies of these issues is a condition precedent to WNP implementation.

<sup>7</sup> CTIA Waiver Petition at 6-7, Attached Declaration of Arthur L. Prest.

necessary for service providers to implement WNP. As it normally takes 18-24 months from the completion of standards to put products to market, compliance with the current deadline for most carriers is simply not feasible.<sup>8</sup>

In addition, and as CTIA discusses in the Waiver Petition, a number of technical issues remain outstanding in spite of the wireless industry's considerable progress toward number portability implementation. Perhaps most significantly, the mobile identification number (MIN) currently serves as a Mobile Directory Number (MDN) for all carriers. Number portability will necessitate splitting the MIN from the MDN which, in turn, will require the creation of a second ten-digit number for all MINs. Because of the MIN-MDN split, CMRS providers will need additional time to test and implement WNP capabilities. Moreover, and importantly, all CMRS providers' networks must be capable of recognizing and distinguishing MDNs from MINs to support nationwide roaming; otherwise, roamers with ported numbers may be unable to roam while outside their home market. This is a technical consideration not faced by landline carriers in their implementation of number portability and also will require time to be implemented in a manner that does not jeopardize network reliability.

Finally, the carrier systems used in providing service, including billing, customer care, sales automation, maintenance and repair and inventory systems, among others, will require modifications and testing to implement number portability. Again, these important system modifications will take time to implement.

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<sup>8</sup> *Id.*, Declaration of Arthur L. Prest at 5.

**CONCLUSION**

For the reasons discussed herein and in the CTIA Petition, PrimeCo urges the Commission to grant CTIA's filing and extend the WNP compliance deadline to March 31, 2000.

Respectfully submitted,

**PRIMECO PERSONAL COMMUNICATIONS, L.P.**

A handwritten signature in black ink, reading "William L. Roughton, Jr." followed by a stylized flourish.

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Its Attorney

January 9, 1998